

Infrastructure · Water · Environment · Buildings

Mr. Keith Krawczyk
MDEQ-RRD-Superfund
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ENVIRONMENTAL

Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site King Highway Landfill Operable Unit 3 Progress Report (December 2011)

Dear Keith:

Attached is the December 2011 Monthly Progress Report for the King Highway Landfill Operable Unit 3 (KHL OU) of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) as per Section XVI of the Administrative Order by Consent for the Remedial Design/Remedial Action at the KHL OU, as was fully-executed on February 8, 2000 (AOC). Please note however, pursuant to Section XVI of the AOC, after a Certificate of Completion of Construction is issued by the Michigan Department of Environmental Quality (MDEQ), as provided in Section XXVII (Certificate of Completion of Construction) of the AOC, progress reports shall be submitted pursuant to the schedules set forth in the plans identified in the Statement of Work.

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS of New York, Inc.

Patrick McGuire

Principal Environmental Engineer

Copies:

Garry Griffith, P.E., Georgia-Pacific LLC Daria Devantier, Michigan Department of Environmental Quality Michael Berkoff, USEPA Region 5 Dawn Penniman, P.E., ARCADIS Date

January 24, 2012

Contac

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Our ref

B0064583.0003.00675

DECEMBER 2011

PREPARED JANUARY 24, 2012

ON BEHALF OF GEORGIA-PACIFIC LLC

SUBMITTED TO

KEITH KRAWCZYK, PROJECT COORDINATOR REMEDIATION AND REDEVELOPMENT DIVISION

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DECEMBER 2011

Remedial Activities

- On November 30, ARCADIS submitted to MDEQ the November 2011 Monthly Progress Report.
- Georgia-Pacific LLC (Georgia-Pacific) and MDEQ have been in communication regarding revisions to the DRAFT FINAL Final Report for Completion of Construction (Draft Final Completion Report) and DRAFT FINAL Operation and Maintenance Plan (Draft Final O&M Plan) and the status of locating RMT record drawings and liner certifications from TRC Companies, Inc. (TRC; TRC acquired the Environmental Business Unit of RMT in June 2011). A summary of the key communications is presented below.
 - MDEQ contacted Georgia-Pacific via e-mail on December 9 and 15 to follow-up on Georgia-Pacific's understanding of MDEQ's expectations for the revised content of Section 11 of the Draft Final Completion Report, and inquire about the status of locating the RMT record drawings and liner certifications.
 - ARCADIS, on behalf of Georgia-Pacific, transmitted revised Section 11 of the Draft Final Completion Report to MDEQ via e-mail on December 16 to verify that the revised content was in line with MDEQ's September 19 preliminary comments on the Draft Final Completion Report; and proposed a conference call for the following week to discuss the revised content of Section 11 and the status of locating the RMT record drawings and liner certifications.
 - MDEQ contacted ARCADIS and Georgia-Pacific via e-mail on December 20 and indicated that given that many MDEQ staff would not be available the following week, it would be better to schedule a conference call after January 1, 2012.
 - ARCADIS, on behalf of Georgia-Pacific, contacted MDEQ via e-mail on December 21 and requested that due to the holiday schedule and the fact that Georgia-Pacific had not received any RMT record drawings or liner certifications from TRC to date, the previously agreed-upon submission date (i.e., January 3, 2012) for the Draft Final Completion Report and Draft Final O&M Plan be rescheduled to February 3, 2012.
 - MDEQ contacted ARCADIS and Georgia-Pacific via e-mail on December 22 and stated the revised submittal date for the Draft Final Completion Report and Draft Final O&M Plan (February 3, 2012) was acceptable; however, MDEQ would like to know the items Georgia-Pacific has requested from TRC and TRC's response, and suggested documenting Georgia-Pacific's efforts.
- In December, ARCADIS contacted a representative of TRC (via e-mail on December 2, 8, 12, 15, and 21 and phone calls on December 8, 15, and 22) in the interest of obtaining certain RMT record drawings and landfill liner certification information related to the KHL OU, which, if obtained, would be included in the resubmission of the Draft Final Completion Report.

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DECEMBER 2011

Operation, Maintenance and Monitoring Activities

 On December 16, on behalf of Georgia-Pacific, ARCADIS submitted the 2011 4th quarter post-closure landfill gas monitoring report.

Upcoming Activities

- Georgia-Pacific will continue to work with the Michigan Department of Attorney General (MDAG) and MDEQ on finalizing the revised Restrictive Covenants for the KHL OU and Mill Lagoons, along with the associated AOC amendment. Georgia-Pacific also awaits comments from MDAG and MDEQ on the revised survey information associated with the Restrictive Covenants, which ARCADIS submitted to MDAG and MDEQ on August 17, 2011.
- Georgia-Pacific will continue to work with TRC to obtain the relevant record drawings and landfill liner information to be included in the revised Draft Final Completion Report, if obtained.
- Georgia-Pacific and MDEQ are scheduled to participate in a conference call on January 6, 2012 to discuss the revisions to Section 11 of the Draft Final Completion Report and the status of locating RMT record drawings and liner certifications related to the KHL OU.
- Georgia-Pacific will continue to work with the City of Kalamazoo to repair the fence along the west side of the landfill and to install a gate for future access to this area.
- The Draft Final Completion Report and Draft Final O&M Plan are to be submitted to MDEQ on or before February 3, 2012.